

United States District Court

DISTRICT OF NEW HAMPSHIRE

United States of America

v.

Ian Freeman

CASE NUMBER: 1:21-cr-000041

**FACTORS TO BE CONSIDERED WHEN CONSIDERING THE TAX EVASION
CHARGES**

NOW COMES the Defendant, Ian Freeman, by and through counsel, and respectfully requests that this Honorable Court instruct the jury regarding the tax evasion counts that they may consider the following factors:

1. Whether Mr. Freeman was contacted by the IRS in 2016, 2017, 2018, 2019 or ever to clarify his financial positions.
2. Whether Mr. Freeman altered paperwork, ledgers, forms, or returns to deceive the IRS in any meaningful way.
3. Whether evidence has been offered to expose Mr. Freeman existing in a lavish lifestyle including large real estate transactions, automobile purchases, or extensive purchases of jewelry and precious metals.
4. If Mr. Freeman filed false, federal tax returns anytime in the past.
5. If The Defendant lived openly and publicly in 2016, 2017, 2018, and 2019.
6. Did the representative from the IRS consider any possible exemptions or deductions when computing her the claimed tax liability of Ian Freeman.

7. Does the IRS generally send a letter out to the taxpayer before a civil or criminal proceeding is initiated?

WHEREFORE, The Defendant prays that this Honorable Court recognize these factors when considering the tax evasion charges.

Respectfully Submitted,

December 19, 2022

Date

/s/ Mark L Sisti

Signature

Mark L. Sisti

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CERTIFICATION

I hereby certify that a copy of this pleading was forwarded to Seth Aframe, Esq. and Georgiana MacDonald, Esq of the U.S. District Attorney's Office, electronically through EFC on December 19, 2022.

December 19, 2022

Date

/s/ Mark L Sisti

Signature

Mark L. Sisti

Print Name